

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

PACIFIC GAS AND ELECTRIC
COMPANY,

Defendant.

No. CR 14-00175 WHA

SIXTH REQUEST RE DIXIE FIRE

Responses to the following shall be due no later than **DECEMBER 8, 2021, AT NOON.**

55. In responding to Question No. 38, PG&E represented, “NDCC Operator #2’s supervisor, NDCC Operator #3, is currently out ill. PG&E will advise the Court if the supervisor recalls being aware of or consulted about the outage” (Dkt. No. 1515 n. 11). PG&E has, however, submitted dispatch transcripts showing that the NDCC Distribution Operator #3 knew of the general issue because Operator #3 earlier left the Troubleman a voicemail mentioning the “outage or concern.” He spoke to the Troubleman directly at 14:59 on July 13 (Dkt. No. 1476-3, Exhs. JJ-10, JJ-13). In fact, Operator #3 appears to have been the last person to speak with the Troubleman, in part about the instructions that Operator #2 gave to the Troubleman, prior to the Troubleman discovering the fire (*id.* at Exh. JJ-11). Additionally, in responding to Question No. 38, NDCC Operator #2 elided the real question. He answered that he “thought that the cause of the outage at the Cresta Dam might have been the blown fuse” (Dkt. No. 1515 Exh. EEE ¶ 5). The real question is: What did NDCC Distribution Operators #2 and #3 think were the possible cause(s) (including ground faults) that could cause the

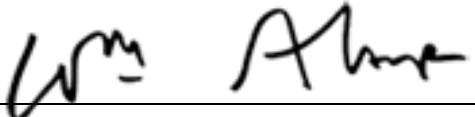
1 outage or the fuse to blow, such that it was prudent *not* to cut the power to the line, at the
 2 relevant time (Operator #2: 14:43; Operator #3: 14:59)? Both Operators shall answer, under
 3 oath.

4 56. PG&E has stated: “[A]pproximately 1,125 transformer level and above outages
 5 have occurred in HFTDs in PG&E’s territory between May 10, 2021 and July 12, 2021” (Dkt.
 6 No. 1747 at 7). The Court would like to know, in HFTDs, the scope of causes for blown fuses.
 7 A bad transformer does not always blow a fuse. So, when a fuse blows, what have been the
 8 reasons, broken down by number and causes? Limit your answer to blown fuses only (without
 9 transformer failure where the fuses remain closed). Answer for 2021 or the most recent period
 10 for which PG&E has this information. If this information is unavailable in PG&E’s records,
 11 then provide the break-down of causes of outages in HFTDs (in 2021 or the most recent period
 12 possible). On the Bucks Creek circuit, where were all transformers and couldn’t they have all
 13 been readily checked? There were no transformers near fuse 17733, true?

14 57. PG&E has stated that it introduced Fast Trip Mitigation in the HFTDs after the
 15 Dixie Fire. Was Fast Trip Mitigation introduced in *all* HFTD territory, or in just a portion? If
 16 applicable, state what portion. Why wasn’t Fast Trip Mitigation introduced long ago?

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 18 **IT IS SO ORDERED.**

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 20 Dated: December 2, 2021.

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 23 WILLIAM ALSUP
 24 UNITED STATES DISTRICT JUDGE
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